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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

HAZEL WALSH,

Plaintiff,

v.

KINDRED HEALTHCARE, INC., et al.,

Defendants.

Case No. 3:11-cv-00050-JSW

**STIPULATION AND [PROPOSED]
ORDER FOR 90-DAY STAY OF ACTION
TO PERMIT PARTIES TO ATTEND
MEDIATION**

The Honorable Jeffrey S. White

WHEREAS the parties have discussed scheduling issues and issues related to ADR in
connection with the upcoming Case management Conference schedule for September 28, 2012;

WHEREAS the parties have agreed to a process that involves an exchange of data and a
mediation with a private mediator;

1 **WHEREAS** the parties do not want to expend resources in connection with discovery and
2 other litigation issues while they are engaging in this mediation process;

3 **WHEREAS** the parties believe that a 90-day stay of the litigation will allow them to
4 engage in a mediation process in an attempt to explore resolution of this matter;

5 **NOW THEREFORE**, it is stipulated that:

6 1. There will be a 90-day stay of the litigation until December 20, 2012;

7 2. The parties will advise the Court of their progress at the end of this 90-day period.

8 Dated: September 20, 2012

Respectfully submitted,

9 MANATT, PHELPS & PHILLIPS

10 By: /s/ Brad W. Seiling

11 Brad W. Seiling

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20 Dated: September 20, 2012

Respectfully submitted,

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1 Dated: September 20, 2012

Respectfully submitted,

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22 *HARRY HARRISON*

23 **Filer's Attestation:** Pursuant to General Order No. 45, Section X(B) regarding signatures, Brad
24 W. Seiling hereby attests that concurrence in the filing of this document has been obtained.

25 PURSUANT TO STIPULATION, IT IS SO ORDERED.

26
27 Dated: September 24, 2012


The Honorable Jeffrey S. White

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